

Dusette, Dean

From: Arndt, Elsa
Sent: Thursday, October 18, 2007 11:43 AM
To: Dusette, Dean
Subject: 421

Dean,

Comments on 421 Recommissioning DEIR:

Executive Summary

1. Page ES-8 and ES-10 – Add bullet item stating the addition of camera surveillance mounted on Pier 421-2 that would monitor the piers and would provide live video feed displayed in EOF Control Room. (I received a call from a nearby resident who was reviewing the DEIR and had missed this when listed on page ES-2.)

ES-Table – Summary of Environmental Impacts for Proposed Project:

2. Page ES-7 (S-4f) – include County OES.
3. Page ES-14 (GEO-1c) – Add that EAP Earthquake Checklist will be updated to include Seismic Inspection of 421.
4. Page ES-14 (GEO-2) – Add that Earthquake Checklist will include inspection for Landslides along bluff. Add to weekly Inspection Schedule – Inspection of Coastal Bluff, Access Road, Seawall, and Rock Revetment.
5. Page ES-18 (S-4c) – Add Venoco shall demonstrate spill response capability by responding to not more than two surprise spill drills each year which may be called on the property or along the pipeline route.
6. Page ES-19 (S-5) – Add that OSCP will be updated.
7. Page ES-21 (Haz 1a) - Need to clarify that they are talking about to separate plans. The construction plans are project specific.
8. MBIO-4 and TBIO-2a – Change EAP to OSCP.

Include that if project is approved, OES will request that standard permit conditions apply to Venoco and that Venoco will be asked to participate in the P-4 Plan...Santa Barbara County Area Oil & Gas Industry Emergency Response Plan dealing with Industrial Mutual Aid.

Thanks!!
Elsa

11/14/2007



Fire Department

"Serving the community since 1926"

HEADQUARTERS

4410 Cathedral Oaks Road
Santa Barbara, CA 93110-1042
(805) 681-5500 FAX: (805) 681-5563

John M. Scherrei
Fire Chief
County Fire Warden

November 8, 2007

Ms. Laura Vlk, Planner
City of Goleta Planning Department
130 Cremona Drive, Suite B
Goleta, CA 93117

Dear Ms. Vlk:

SUBJECT: Venoco PRC 421 Re-commissioning Project
Draft Environmental Impact Report (EIR)

Thank you for the opportunity to review and comment on the Draft EIR for the Venoco PRC 421 Re-commissioning project. Our review comments are as follows:

On page 4-310, line #23:

"The SBCFD has ~~15~~ 16 fire stations. ~~Six~~ Five fire stations are...."

Because of the recent consolidation of Solvang into the County Fire Department, we now have 16 fire stations. Also, there are only five (5) fire stations located in the Goleta Valley.

On Page 4-311 line #14:

"Currently all three fire stations within the Goleta city limits are staffed with only 3-person crews (refer to table 4.9-1)."

Please add the word "only" into this sentence.

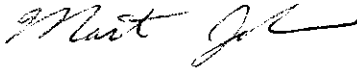
On Page 4-312 line #'s 18-20:

Please insert the following changes:

Construction and outfitting of the fire station would likely cost nearly \$5 \$8 million; currently the city County Fire Department has collected approximately \$700,000 \$850,000 towards that goal (SBCFD 2006 2007).

If you have any further questions or need clarification, please do not hesitate to call.

Yours in the interest of life and fire safety,

A handwritten signature in black ink, appearing to read "Mart Johnson", with a stylized flourish at the end.

Martin Johnson, Captain
Fire Prevention Division

c: Dean Dusette, Planner, Planning & Development-Energy Division
APN/Chron

October 8, 2007

187-18-164

Venoco: PRC 421 DEIR

Mr. Mike Zimmer
COUNTY OF SANTA BARBARA
Building & Safety Division
123 E. Anapamu St
Santa Barbara, CA 93101

Dear Mike:

Attached are the comments for Venoco's PRC-421 Re-commissioning Project Draft EIR.

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Sincerely,

ROBERT BROWN ENGINEERS

Jay Sheth

c: D. Anthony
D. Dusette
J. Barnes

**VENOCO
PRC-421 DRAFT EIR
REVIEW COMMENTS**

EXECUTIVE SUMMARY

Page ES-4 **Line 3**

Executive Summary should be a stand alone section with its own Tables and Figures.

Page ES-4 **Line 11**

It states, “one new 2-inch flowlines”. Is there one new flowline or two flowlines?

Page ES-9 **Lines 5-10**

There would be some associated gas produced with the oil production. How is this associated gas going to be handled? How was this gas handled when the PRC-421 was in operation?

Page ES-20 **S-8, S-9 and S-10** **Recommended Mitigation Measures**

What does “No additional MMS are available “mean under the Recommended Mitigation Measures?

Page ES-24 **AQ-1b**

Correct “..catalyst can also control...” to “...catalyst can also reduce...”

Page ES-27 **WQ-4a** **1st Bullet**

Shall the detention facilities be constructed prior to or concurrently with pipeline construction?

Page ES-27 **WQ-4a** **5th Bullet**

Please define “unworked soils”.

Page ES-28 **Section 4.6** **Marine Biblogical Resources**

Correct “Section 4.7” to “Section 4.6” in the title. Section 4.7 is Terrestrial Biblogical Resources.

Page ES-54 **VR-3** **No Project with Pressure Testing**

The Cyclonic Separator is not going to be installed for the No Project with Pressure Testing

Alternative. As a result, there should be “No Impact” for VR-3: Cyclone Separator.

SECTION 1.0 INTRODUCTION

Page 1-6

Page 22

CSLC has released the Final EIR for the EMT Lease Renewal Project. Please update “Draft EIR” to “Final EIR” throughout the document. Update the text as necessary to reflect any changes in the impacts, mitigation measures, etc. due to the Final EIR.

Page 1-8

Line 18

Figure1-2 shows 39 new wells and not 40 as stated.

Page 1-11

Footnote 1

There is also a Footnote 1 on the previous page (Page 1-10). Where is this Footnote 1 referenced? Please reconcile.

SECTION 2.0

DESCRIPTION OF PROPOSED PROJECT

Page 2-2

Line 9

Crude oils generally do not have any Carbon Dioxide.

Page 2-11

Table 2-1

Role in Ellwood Area Production

At EOF, the oil emulsion is not pumped through filters and emulsion/water heat exchanger. The emulsion received from Platform Holy is routed through emulsion/crude oil heat exchanger to the heater treaters.

Page 2-16

Line 1, 6 and 15 7) 9)

Define “steel coiled tubing” flowline. Is it different from the standard 2” pipe?

Page 2-26

Line 10

The Full Development Project EIR was not released for agency and public review in the 2007 Summer. Update the text as appropriate.

Page 2-26

Line 17

Add “or the trucking option from EOF” after “2016 (UCSB)”.

SECTION 3.0

ALTERNATIVES AND CUMULATIVE PROJECTS

Page 3-11 Section 3.3.4

There will be some associated gas produced with the oil production. How is this produced gas going to be handled?

Page 3-13 Line 5

There is no additional line to be installed. An existing 2" pipeline will be repaired and brought back to service.

Page 3-17 Line 12

The Figure 3-2 does not show the ROSF or the City of Carpinteria.

Page 3-25 Line 8

Please confirm the peak rate of 14000 MMSCFD. It appears to be about 12 times the average rate of 1200 MMSCFD.

Page 3-28 Line 24

Table 13-3 does not exist. Should it be Table 3-3?

SECTION 4.0

ENVIRONMENTAL ANALYSIS

Page 4-35 Lines 19 thru 21 Trucking Sub-Alternative

Correct "EMT to AALP" to "EOF to ROSF".

It states, "...use of an existing pipeline" which existing pipeline is this referring to? Please include details.

Page 4-42 EMT Condition

Hydrotesting of the Loading Line in December 2006 indicated the line passed the test. Update "2005" to "2006".

Page 4-45 Line 27

Crude oil with low Sulfur content (not H₂S content) is referred to as "sweet crude".

Page 4-60 Figure 4.2-5

The total height for the vessels is shown to be 15'. The GLCS-300 (Gas - Liquid Cyclone Separator) vessel is shown to be 20' S/S. With the heads and skirt, the total vessel height would be close to 25' or more. Please correct as appropriate.

The Figure is not legible. Also, the details for inside the Well Celler and inside the FE-200 meter enclosure are not visible (very faint).

The flow streams from and to GLCS-300 (Gas-Liquid Cyclone Separator) and LLCS-400 (Liquid-Liquid Cyclone Separator) are not shown clearly. A separate details should be provided.

Page 4-68 Lines 1-2

Would there be more than one line relocated or just one 2" Oil Pipeline (as per MM S-3b)? Please revise as appropriate.

Page 4-77 Lines 17-23 MM S-4e

This Mitigation Measure is not clear. Does this MM require well casing testing to meet operating specification of 3,000 psig pressure or 785 psig? Please clarify.

Page 4-80 Mitigation Measures

Provide and discuss Residual Impact for Impact S-5 due to the MM S- 5a, 5b and 5c.

Page 4-80 Impact S-6.

The current EOF operation ships oil to Line 96 in a "batch" mode. The oil production is stored at EOF and shipped when warranted. The proposed project will ship oil continuously in Line 96. How is this "continuous" mode of operation going to work for Line 96 operation?

Page 4-82 Lines 23-25

There is no MM S-7a. Also, what are the options that would be revised by applicable agencies.

Page 4-84 Line 22

Table 4.2-5 shows decrease in spill probabilities from 82% to 81% and not increase from 84% to 86% as stated. There should be increase in spill probabilities due to increase in the number of transfer operations from 23 (existing conditions) to 88 (permitted conditions). Please revise

the text and the Table as appropriate.

Page 4-84 Table 4.2-5

Table 4.2-5 shows decrease in spill probabilities for Permitted Conditions as compared to the Existing Conditions for both EMT Loading Line-Leak on Land (11% to 10%) and EMT Loading Line Leak on Ocean (82% to 81%). Both of these spill probabilities should increase due to significant increase in annual transfer operations from 23 (Existing Conditions) to 88 (Permitted Conditions), about four fold increase. All other scenarios (Rupture on Land, Ocean and Pumping Equipment) appear to be consistent showing the increase.

Page 4-86 Table 4.2-6

For the Spill Size Scenario of > 10 gallons, for “With PRC 421” correct the Failure Rate and Spill Probability (percent) to 1.736E-02 and 15.9, respectively and for “EMT Permitted 421” Failure Rate and Spill Probability (percent) to 5.456E-02 and 42.1, respectively.

Page 4-89 Table 4.7-8

There is no MM S-7a. Correct it to MM S-7.

Page 4-94 Line 13

Correct to state that re-injection would occur at EOF and not at Platform Holly as stated.

Page 4-95 Line 2

Correct to state that re-injection would occur at EOF and not at Platform Holly as stated.

Page 4-96 Line 11-16

There would be some associated gas produced with the oil production. How is this associated gas handled and disposed off?

Page 4-100 Line 22

Figure 2-10 does not exist.

Page 4-102 Impact S-14

This Sub-alternate has an estimated probability of one accident every 22.5 years. Due to the 12 year project life, the accident may not occur during the project life.

As a result, the impact should be Potentially Significant Class II.

Page 4-103 Line 13

Table 3-2 shows Truck Trips from EOF to ROSF and not cumulative projects.

Page 4-105 Line 18

Sulfur content of the Crude Oil does not produce acute risks, H₂S content does.

Page 4-122 Line 22

No project Alternative does not encounter HAZ-1 impact as per the HAZ-1 impact discussion. HAZ -1 impact discusses mainly the construction impacts. There would be no construction for the No Project Alternative.

Page 4-123 Lines 30-33

This alternate would produce some associated gas with the oil production. Discuss handling and disposal of this associated gas.

Page 4-145 Lines 28-29

The operational emissions should be lower for the Onshore Separation at EOF due to elimination of the Separation and Gas Reinjection Facilities at the project site.

Page 4-146 Lines 25-26

The operational emissions should be lower for the Reinjection at Platform Holly due to elimination of the Separation and gas reinjection facilities at the project site.

Page 4-149 Line 3

Table 3-2 provides details about Truck Trips from EOF to ROSF and not Cumulative Projects.

Page 4-150 lines 23-31

The calculated amount of 0.21 percent is not correct. The total 1,419 thousand barrels of oil production is for entire life (12 years) of the project which is being compared to a single 2005 year of production (674,276 thousand barrels) in California.

Based upon the 12 year life, the average annual production is 118,250 barrels that represents

about 0.0175% of 2005 production (674,276 thousand barrels).

0.0175% market share does not appear to be significant and should not have any detrimental effect on the current demand and consumption of oil.

Page 4-151 **Lines 1-21**

The calculated amount of 0.10 percent is not correct. The total 565,909 tons (509,318 metric tons) of CO₂ produced from 1,419 thousand barrels of oil production is for the entire 12 year of the project life which is being compared to a single year (year 2004) of 492 million metric tons of CO₂ produced in California.

Based upon the 12 year life, the average annual CO₂ production would be about 42,443 metric tons (509,318/12). This would equate to 0.0086% of the 2004 CO₂ production in California (492 million metric tons).

0.0086% market share does not appear to be significant and should not have any detrimental effect on the GHG emissions.

Page 4-409 **Lines 28-34**

How would Re-commissioning Using Historic Production Methods Alternative increase the diesel consumption? The project would use gas-fired internal combustion engine to power the pump. The alternate would not consume any diesel.

Page 5-2 **Line 34**

There is no offshore Separation - Processing proposed for the project.

Page 5-4 **Line 25**

There is no offshore Separation - Processing proposed for the project.